

UNITED STATES DISTRICT COURT  
for the  
Eastern District of Michigan

United States of America

v.

Clayton Romero

Case: 4:23-mj-30068

Assigned To : Ivy, Curtis, Jr

Assign. Date : 2/15/2023

Description: COMP USA v Clayton Romero (kcm)

**CRIMINAL COMPLAINT**

I, the complainant in this case, state that the following is true to the best of my knowledge and belief.

On or about the date(s) of February 14, 2023 in the county of Livingston in the  
Eastern District of Michigan, the defendant(s) violated:

*Code Section**Offense Description*

18 U.S.C. § 922(g)

Felon in possession of a firearm

This criminal complaint is based on these facts:

See attached affidavit.

☒ Continued on the attached sheet.

Sworn to before me and signed in my presence  
and/or by reliable electronic means.

Date: February 15, 2023City and state: Flint, MI*Complainant's signature*Brandon Follrod, Special Agent, DEA*Printed name and title**Judge's signature*Hon. Curtis Ivy, Jr., United States Magistrate Judge*Printed name and title*

**AFFIDAVIT IN SUPPORT OF A CRIMINAL COMPLAINT**

I, Brandon Follrod, after being duly sworn, state as follows:

1. I am a Special Agent with the Drug Enforcement Administration and have been since June 2019. I am thus a “federal law enforcement officer” within the meaning of Federal Rule of Criminal Procedure 41(a)(2)(C), that is, a government agent engaged in enforcing the criminal laws and duly authorized by the Attorney General to request a search warrant. Previously, I was a police officer for the City of Sylvania, Ohio for five years prior to being employed as a special agent for the DEA. I have received specialized training on the subjects of drug trafficking and money laundering from the DEA, and have personally been involved in investigations concerning the possession, manufacture, distribution, and importation of controlled substances, as well as methods used to finance drug transactions and launder drug proceeds. I am presently involved in investigating covert and overt drug trafficking and money laundering complaints. I am familiar with and have participated in the normal methods of drug trafficking and money laundering investigation, including, but not limited to, visual and video surveillance, witness questioning, obtaining and executing search and arrest warrants. I am presently working in conjunction with other federal and local police agents and agencies investigating drug trafficking throughout the United States of America.

2. This affidavit is based on my personal knowledge, as well as information obtained from documents, electronic databases, witnesses, and other law enforcement personnel involved in this investigation. The information contained in this affidavit is provided for the purpose of establishing probable cause for a search warrant and does not contain all of the details of this case known to me.

3. This affidavit provides information necessary to establish probable cause the Clayton ROMERO (DOB XX-XX-1987) has violated 18 U.S.C. § 922(g) (felon in possession of a firearm).

#### **CRIMINAL HISTORY OF CLAYTON ROMERO**

4. The following is all criminal convictions for Clayton ROMERO, which includes felony convictions:

- 2007 Trafficking in Cocaine, Illegal Drugs, Marijuana or Methamphetamine (Georgia)
- 2010 – Controlled Substance Possession Methamphetamine/Ecstasy
- 2015 – Controlled Substance – Operating and Maintaining a laboratory
- 2015 – Controlled Substance – Use of Marijuana, synthetic marijuana, spice or salvia

- 2018 Controlled Substance – Possession of Methamphetamine/Ecstasy

5. ROMERO was sentenced to prison terms exceeding one year for the 2007 and 2018 convictions, and so there is probable cause to conclude that he is aware of his status as a convicted felon.

### **INVESTIGATIVE BACKGROUND AND PROBABLE CAUSE**

6. In February 2023, I was notified by Livingston County Sheriff's Office (LCSO) Detectives that ROMERO was a pound-level methamphetamine dealer that operates in Ingham, Livingston, and Jackson counties. LCSO Detectives advised that ROMERO drives a dark colored Jeep and is likely to be armed. I then checked open-source databases and subsequently discovered that ROMERO's most recent listed address on his driver's license is in Stockbridge, Ingham County, Michigan.

7. On February 7, 2023, I conducted surveillance at ROMERO's listed address and observed a dark colored Jeep Cherokee bearing a Michigan license plate EAH1662. A subsequent computer search revealed that the registered owner was Clayton ROMERO's mother. On February 8, 2023, I conducted surveillance at ROMERO's listed address and was subsequently approached by the Stockbridge Chief of Police, Matthew Bartus. Chief Bartus was able to ascertain that I was a law enforcement officer conducting surveillance on ROMERO. Chief Bartus stated

that ROMERO has been dealing large amounts of methamphetamine and has had numerous complaints about his drug trafficking activity. Chief Bartus also stated that he has received complaints that ROMERO often carries a 9mm semi-automatic pistol in his Jeep Cherokee at all times.

8. On February 14, 2023, myself and other DEA investigators conducted surveillance at ROMERO's listed address where investigators observed a black Jeep Cherokee parked in front of the residence. Around 12:30pm, investigators observed ROMERO exit the residence with a medium sized object in his hand (later determined to be one of the boxes containing contraband, described below) and place the object inside of the Jeep Cherokee. ROMERO departed the residence and head east on State Route 106.

9. At approximately 1:04pm, Deputies from LCSO observed ROMERO traveling at a higher rate of speed than the posted speed limit. Deputies conducted a traffic stop on ROMERO on M-36 in Livingston County, Michigan. Deputy K-9 Joseph Topolski conducted a "free-air" sniff with his Police K-9 around ROMERO's vehicle. Deputy Topolski's K-9 indicated positively to the odor of narcotics coming from inside of the vehicle. LCSO deputies then conducted a probable cause search of ROMERO's vehicle, in which they discovered a black plastic box containing several used hypodermic needles, electronic scales with suspected drug residue, glass pipes with residue (which later tested positive for

methamphetamine), and drug packaging and processing equipment. Deputies also located a black and silver lock box which contained a black Taurus 9mm semi-automatic pistol (Serial #TMT20698). Deputies discovered a loaded magazine with ten (10) 9mm rounds loaded into the pistol. Deputies also discovered an extended black metal pistol magazine with twenty (20) 9mm rounds. Additionally, Deputies discovered forty-nine (49) additional loose rounds of ammunition inside of the black and silver lock box.

10. ROMERO was subsequently arrested and booked into the Livingston County Jail.

11. I spoke with ATF Special Agent Kevin Rambus about the seized Taurus firearm. Special Agent Kevin Rambus, who is an interstate nexus expert, examined a shared photograph of the seized firearm stated that Taurus does not manufacture their firearms in the state of Michigan.

**CONCLUSION**

12. Probable cause therefore exists that Clayton ROMERO violated Title 18 U.S.C. § 922(g) (felon in possession of a firearm).

Respectfully submitted,



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Brandon Follrod  
Special Agent, DEA

Sworn to before me and signed in my  
presence and/or by reliable electronic means.



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Hon. Curtis Ivy, Jr.  
United States Magistrate Judge

Dated: February 15, 2023